



Consulting Engineers
and Scientists

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December 12, 2007
(PBW Project No. 1381)

VIA OVERNIGHT COURIER

Mr. Gary Miller
Superfund Division, Region 6 (6SF-AP)
Arkansas/Texas Section
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: November 2007 Monthly Status Report, Gulfco Marine Maintenance Site, Freeport,
Texas

Dear Mr. Miller:

Pursuant to Section XII, Paragraph 53 of the modified Unilateral Administrative Order (UAO) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW) has prepared this monthly status report on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow) (collectively referred to as Respondents in the UAO and the Statement of Work (SOW) attached thereto). As discussed in our telephone conversation on August 2, 2005, monthly status reports for a given month will be submitted by the 15th of the following month as required in Paragraph 53 of the UAO, rather than by the 10th of the following month as indicated in Appendix 1 of the UAO. In accordance with the UAO requirements this report addresses the topics listed below:

1. Actions which have been taken toward achieving compliance with the UAO during the previous month – The following actions were taken during the previous month:
 - RI/FS site characterization activities (SOW Paragraphs 34 through 36) detailed under Task 6 of the RI/FS Work Plan including:
 - Subtask 6.3 – Soil samples were collected from 7 locations within off-site Lot 20 (the former commercial marina property west of the Site), 15 locations within the area of the Site south of Marlin Avenue (the South Area), and 7 locations within the area of the Site north of Marlin Avenue (the North Area) as proposed in my September 11, 2007 letter to you, which was approved with modifications by your letter dated October 30, 2007 (a revised version of my September 11, 2007 letter incorporating the requested modifications was submitted on November 28, 2007).
 - Subtask 6.5 – Groundwater sampling of ten Zone A monitoring wells, hydraulic testing of three Zone A monitoring wells, and installation of a Zone B monitoring well (NE3MW30B) was performed as proposed in my October 12, 2007 letter to you, which was approved with modifications by your letter dated November 8, 2007 (a revised version of my October 12, 2007 letter

incorporating the requested modifications was submitted on November 30, 2007). A soil sample for laboratory analyses was collected from the boring for monitoring well NE3MW30B. Water level elevations were measured in Site monitoring wells and staff gauges on November 7, 2007. Hydraulic testing data analyses were performed.

- Subtask 6.7 – Evaluation of Phase 1 and 2 wetland sediment data was performed and a letter proposing Phase 3 wetland sediment sampling activities was submitted to you on November 1, 2007.
- 2. Results of sampling, tests, modeling and all other data (including raw data) received or generated by or on behalf of Respondents during the previous month – The following data were received or generated during the previous month:
 - Field measurements collected during groundwater sampling are provided in Attachment A.
 - Water levels measured in Site monitoring wells and calculated water level elevations are provided in Attachment B.
 - Hydraulic testing data and subsequent analyses are provided in Attachment C.
- 3. Actions, data and plans which are scheduled for the next two months and other information relating to the progress of work – The following actions are planned for the next two months:
 - RI/FS site characterization activities (SOW Paragraphs 34 through 36) detailed under Task 6 of the RI/FS Work Plan (weather and access permitting) including:
 - Subtask 6.3 – Soil investigation – to be continued through soil sample analyses, data validation, and data evaluation.
 - Subtask 6.5 – Groundwater/NAPL investigation – to be continued through monitoring well development, groundwater sampling and analysis, data validation, and data evaluation.
 - Subtask 6.7 – Sediment investigation – to be continued through data evaluation, sample collection and analyses, and data validation.
- 4. Information regarding percentage of completion, all delays encountered or anticipated that may affect the future schedule for completion of the work required, and efforts made to mitigate those delays or anticipated delays – RI/FS activities are approximately 65% complete. No delays were encountered this month.

Although not required by the UAO, an alternative project schedule was submitted to you on October 18, 2007 in response to your request. This alternative schedule was based on use of a removal action approach for performance of remaining project activities to obtain construction completion by September 30, 2008, coupled with a partial delisting of the Site. A conference call was held between Respondent and EPA representatives on November 27, 2007 to review the objectives of this schedule and discuss mechanisms to move forward with its implementation.

Mr. Gary Miller
December 12, 2007
Page 3 of 3

Thank you for the opportunity to submit this status report. Should you have any questions, do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC



Eric F. Pastor, P.E.
Principal Engineer

cc: Mr. Doug McReynolds – EA Engineering, Science and Technology
Ms. Luda Voskov – Texas Commission on Environmental Quality
Mr. Robert L. Iuliucci - Sequa Corporation
Mr. Brent Murray – Environmental Quality, Inc.
Mr. Rob Rouse - The Dow Chemical Company
Mr. Allen Daniels - LDL Coastal Limited, LP
Mr. F. William Mahley - Strasburger & Price, LLP
Mr. James C. Morriss III - Thompson & Knight, LLP
Ms. Elizabeth Webb - Thompson & Knight, LLP

ATTACHMENT A

GROUNDWATER SAMPLING FIELD MEASUREMENTS

Gulfco November 2007
Groundwater Field Measurements

Well ID	Date	Parameter	Parameter Value	Parameter Units
OMW21	11/7/2007	conductivity	76216	umhos/cm
		Field DO	0.6	mg/L
		Corrected DO ¹	0.44	mg/L
		ORP ²	-81.7	mV
		pH	6.48	
		temperature	25.2	Celcius
		turbidity	76	NTU
		iron (II)	>3	mg/L
NC2MW28	11/7/2007	conductivity	76430	umhos/cm
		Field DO	0.72	mg/L
		Corrected DO	0.53	mg/L
		ORP	-48.9	mV
		pH	6.56	
		temperature	23.4	Celcius
		turbidity	53	NTU
		iron (II)	>3	mg/L
NE3MW05	11/7/2007	conductivity	19752	umhos/cm
		Field DO	0.76	mg/L
		Corrected DO	0.71	mg/L
		ORP	-168.6	mV
		pH	7.93	
		temperature	24.6	Celcius
		turbidity	48	NTU
		iron (II)	2.197	mg/L
OMW20	11/7/2007	conductivity	69392	umhos/cm
		Field DO	0.42	mg/L
		Corrected DO	0.32	mg/L
		ORP	-21.3	mV
		pH	6.89	
		temperature	25.7	Celcius
		turbidity	17	NTU
		iron (II)	>3	mg/L
ND4MW03	11/8/2007	conductivity	46813	umhos/cm
		Field DO	1.07	mg/L
		Corrected DO	0.90	mg/L
		ORP	-72.9	mV
		pH	6.83	
		temperature	25.9	Celcius
		turbidity	42	NTU
		iron (II)	>3	mg/L
		alkalinity	464	mg/L

Gulfco November 2007
Groundwater Field Measurements

Well ID	Date	Parameter	Parameter Value	Parameter Units
NE1MW04	11/8/2007	conductivity	70423	umhos/cm
		Field DO	0.6	mg/L
		Corrected DO	0.45	mg/L
		ORP	-57.4	mV
		pH	6.48	
		temperature	25.2	Celcius
		turbidity	23	NTU
		iron (II)	>3	mg/L
		alkalinity	386	mg/L
NF2MW06	11/8/2007	conductivity	43897	umhos/cm
		Field DO	0.54	mg/L
		Corrected DO	0.46	mg/L
		ORP	-18.7	mV
		pH	6.85	
		temperature	26.3	Celcius
		turbidity	22	NTU
		iron (II)	>3	mg/L
		alkalinity	426	mg/L
ND3MW02	11/8/2007	conductivity	57331	umhos/cm
		Field DO	0.84	mg/L
		Corrected DO	0.68	mg/L
		ORP	-64.2	mV
		pH	6.34	
		temperature	24.7	Celcius
		turbidity	16	NTU
		iron (II)	>3	mg/L
		alkalinity	418	mg/L
ND3MW29	11/8/2007	conductivity	59326	umhos/cm
		Field DO	1.01	mg/L
		Corrected DO	0.81	mg/L
		ORP	-58.6	mV
		pH	6.17	
		temperature	25.6	Celcius
		turbidity	33	NTU
		iron (II)	>30	mg/L
		alkalinity	384	mg/L

Gulfco November 2007
Groundwater Field Measurements

Well ID	Date	Parameter	Parameter Value	Parameter Units
ND2MW01	11/8/2007	conductivity	69427	umhos/cm
		Field DO	0.58	mg/L
		Corrected DO	0.44	mg/L
		ORP	-77.4	mV
		pH	6.58	
		temperature	26.1	Celcius
		turbidity	28	NTU
		iron (II)	>3	mg/L
		alkalinity	478	mg/L

Notes:

1. Dissolved oxygen concentration corrected for temperature and specific conductance.
2. Field measured oxidation reduction potential (not converted to Eh).

ATTACHMENT B
WATER LEVEL MEASUREMENTS

November 7, 2007 Water Levels

Well ID	Date	Time	MP¹ Elevation (ft AMSL²)	Depth to Water (ft BMP³)	Water Elevation (ft AMSL)
ND2MW01	11/7/2007	850	5.09	4.31	0.78
ND3MW02	11/7/2007	918	6.41	4.93	1.48
ND4MW03	11/7/2007	750	6.20	4.47	1.73
NE1MW04	11/7/2007	820	4.90	3.62	1.28
NE3MW05	11/7/2007	923	6.53	5.21	1.32
NF2MW06	11/7/2007	837	5.35	3.57	1.78
SB4MW07	11/7/2007	726	7.57	6.06	1.51
SE1MW08	11/7/2007	730	7.54	6.03	1.51
SE6MW09	11/7/2007	754	7.66	6.09	1.57
SF5MW10	11/7/2007	742	8.01	5.97	2.04
SF6MW11	11/7/2007	747	8.11	6.71	1.40
SF7MW12	11/7/2007	751	7.96	6.64	1.32
SG2MW13	11/7/2007	736	7.71	6.68	1.03
SH7MW14	11/7/2007	759	8.10	6.74	1.36
SJ1MW15	11/7/2007	850	5.61	3.58	2.03
SJ7MW16	11/7/2007	805	7.19	5.88	1.31
SL8MW17	11/7/2007	811	5.87	4.43	1.44
NB4MW18	11/7/2007	911	4.96	4.19	0.77
NG3MW19	11/7/2007	817	5.08	3.77	1.31
OMW20	11/7/2007	858	4.88	3.01	1.87
OMW21	11/7/2007	842	5.73	5.07	0.66
SA4MW22	11/7/2007	721	7.79	6.57	1.22
ND4MW24B	11/7/2007	831	5.70	3.78	1.92
NG3MW25B	11/7/2007	819	4.91	3.15	1.76
OMW27B	11/7/2007	845	5.45	4.34	1.11
NC2MW28	11/7/2007	906	4.76	2.86	1.90
ND3MW29	11/7/2007	915	5.33	4.38	0.95
MW-1	11/7/2007	NM	6.75	4.21	NM
MW-2	11/7/2007	NM	5.88	3.64	NM
MW-3	11/7/2007	NM	7.23	5.41	NM
HMW-1	11/7/2007	NM	5.15	2.61	NM
HMW-2	11/7/2007	NM	4.69	3.63	NM
HMW-3	11/7/2007	NM	5.20	3.54	NM
BM-1	11/7/2007	823	3.53	1.61	1.92
BM-2	11/7/2007	826	3.30	1.42	1.88
BM-3	11/7/2007	NM	5.10	3.60	NM

Notes:

¹ MP = Measurement Point (Top of PVC well casing).

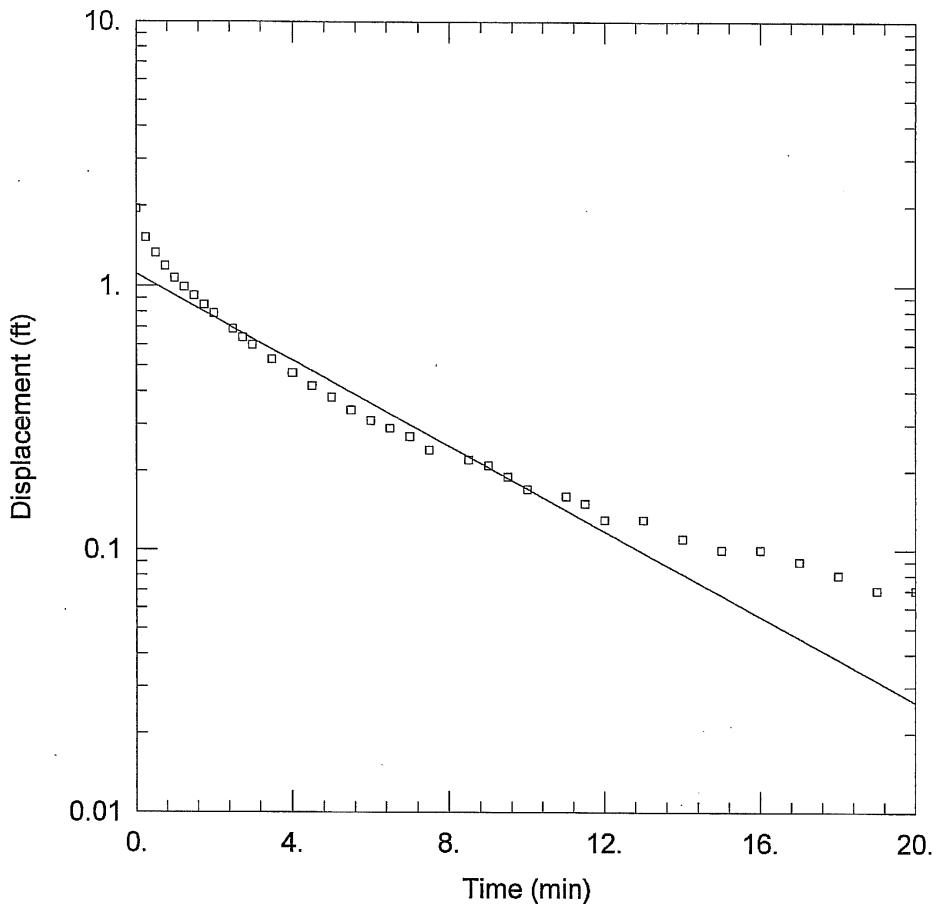
² AMSL = Above Mean Sea Level (NGVD 29).

³ BMP = Below Measurement Point.

ATTACHMENT C
HYDRAULIC TESTING DATA AND RESULTS

SUMMARY OF AQUIFER TEST RESULTS
GULFCO MARINE MAINTENANCE
FREEPORT, BRAZORIA COUNTY, TEXAS

Well Number	Test Type	Aquifer Type	Aquifer Zone	Modeled Aquifer Thickness (ft)	Hydraulic Conductivity (cm/sec)
ND4MW03	Slug	Confined	A	13	8×10^{-5}
NE1MW04	Slug	Confined	A	12	4×10^{-5}
SJ1MW15	Slug	Confined	A	12.5	7×10^{-5}



ND4MW03 SLUG OUT B

Data Set: J:\...\ND4MW03_outB.aqt
 Date: 11/14/07

Time: 15:23:16

PROJECT INFORMATION

Company: PBW
 Client: Gulfco
 Project: 1352-H2
 Test Location: Freeport, TX
 Test Well: ND4MW03
 Test Date: 11-7-07

AQUIFER DATA

Saturated Thickness: 13. ft Anisotropy Ratio (Kz/Kr): 1.

WELL DATA (ND4MW03)

Initial Displacement: 1.95 ft Casing Radius: 0.08 ft
 Wellbore Radius: 0.42 ft Well Skin Radius: 0.42 ft
 Screen Length: 10. ft Total Well Penetration Depth: 13. ft
 Gravel Pack Porosity: 0.2

SOLUTION

Aquifer Model: Confined Solution Method: Bouwer-Rice
 $K = 7.709E-05 \text{ cm/sec}$
042571 $v_0 = 1.112 \text{ ft}$

Data Set: J:\1352 - Gulfco RI\Groundwater\Slug Tests\Analysis based on Screen Length\ND4MW03_outB.aqt
 Title: ND4MW03 Slug Out B
 Date: 11/14/07
 Time: 15:23:23

PROJECT INFORMATION

Company: PBW
 Client: Gulfco
 Project: 1352-H2
 Location: Freeport, TX
 Test Date: 11-7-07
 Test Well: ND4MW03

AQUIFER DATA

Saturated Thickness: 13. ft
 Anisotropy Ratio (Kz/Kr): 1.

SLUG TEST WELL DATA

Initial Displacement: 1.95 ft
 Casing Radius: 0.08 ft
 Wellbore Radius: 0.42 ft
 Well Skin Radius: 0.42 ft
 Screen Length: 10. ft
 Total Well Penetration Depth: 13. ft
 Gravel Pack Porosity: 0.2

No. of observations: 35

<u>Observation Data</u>			
<u>Time (min)</u>	<u>Displacement (ft)</u>	<u>Time (min)</u>	<u>Displacement (ft)</u>
0.25	1.52	7.	0.27
0.5	1.33	7.5	0.24
0.75	1.19	8.5	0.22
1.	1.07	9.	0.21
1.25	0.99	9.5	0.19
1.5	0.92	10.	0.17
1.75	0.85	11.	0.16
2.	0.79	11.5	0.15
2.5	0.69	12.	0.13
2.75	0.64	13.	0.13
3.	0.6	14.	0.11
3.5	0.53	15.	0.1
4.	0.47	16.	0.1
4.5	0.42	17.	0.09
5.	0.38	18.	0.08
5.5	0.34	19.	0.07
6.	0.31	20.	0.07
6.5	0.29		

SOLUTION

Aquifer Model: Confined
 Solution Method: Bouwer-Rice

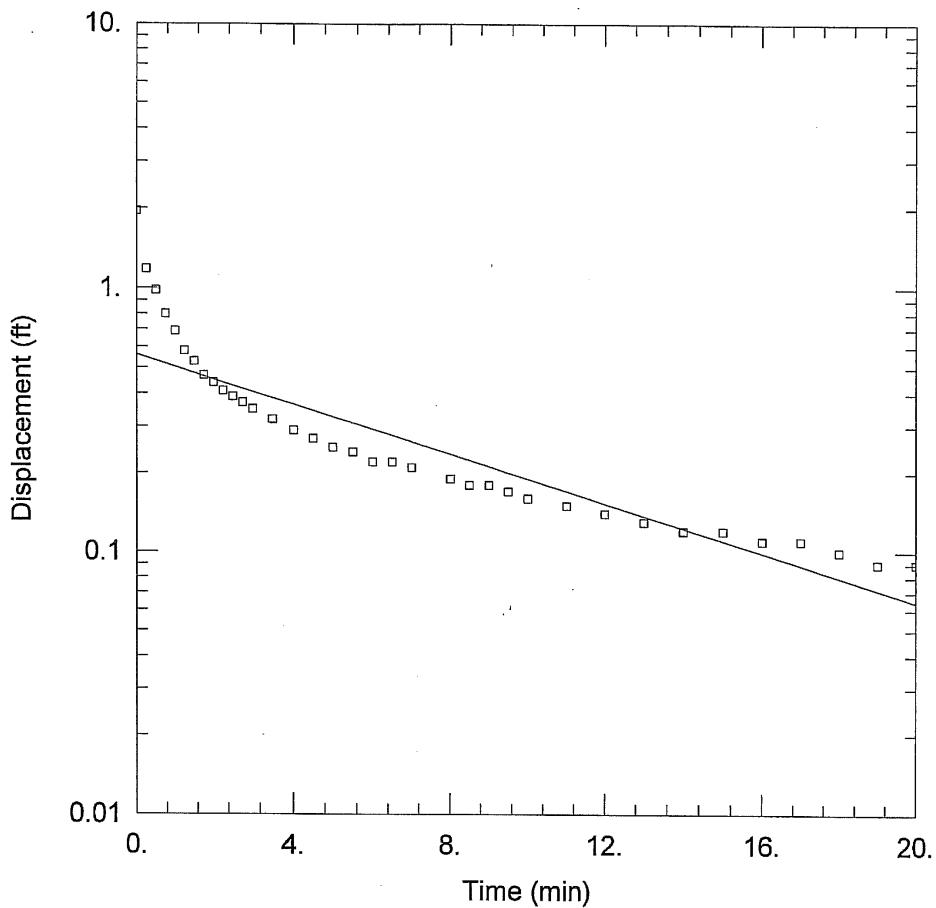
VISUAL ESTIMATION RESULTS

Estimated Parameters

<u>Parameter</u>	<u>Estimate</u>	
K	7.709E-05	cm/sec
y0	1.112	ft

ND4MW03 Slug Out

Observation	Time	WL	Displacement	Weight
1	0.25	5.95	1.52	1
2	0.5	5.78	1.35	1
3	0.75	5.61	1.18	1
4	1	5.52	1.09	1
5	1.25	5.43	1	1
6	1.5	5.35	0.92	1
7	1.75	5.27	0.84	1
8	2	5.22	0.79	1
9	2.5	5.11	0.68	1
10	3	5.04	0.61	1
11	3.5	4.96	0.53	1
12	4	4.91	0.48	1
13	4.5	4.86	0.43	1
14	5	4.82	0.39	1
15	5.5	4.78	0.35	1
16	6	4.75	0.32	1
17	6.5	4.72	0.29	1
18	7	4.7	0.27	1
19	7.5	4.68	0.25	1
20	8	4.67	0.24	1
21	8.5	4.65	0.22	1
22	9	4.63	0.2	1
23	10	4.62	0.19	1
24	11	4.95	0.52	1
25	12	4.58	0.15	1
26	13	4.57	0.14	1
27	15	4.54	0.11	1
28	16	4.53	0.1	1
29	17	4.53	0.1	1
30	20	4.51	0.08	1
31	25	4.49	0.06	1



NE1MW04 SLUG OUT

Data Set: J:\...\NE1MW04_out.aqt
Date: 11/14/07

Time: 13:26:27

PROJECT INFORMATION

Company: PBW
Client: Gulfco
Project: 1352-H2
Test Location: Freeport, TX
Test Well: NE1MW04
Test Date: 11-7-07

AQUIFER DATA

Saturated Thickness: 12. ft Anisotropy Ratio (Kz/Kr): 1.

WELL DATA (NE1MW04)

Initial Displacement: 1.95 ft
Wellbore Radius: 0.42 ft
Screen Length: 10. ft
Gravel Pack Porosity: 0.2
Casing Radius: 0.08 ft
Well Skin Radius: 0.42 ft
Total Well Penetration Depth: 12. ft

SOLUTION

Aquifer Model: Confined
 $K = 4.377E-05 \text{ cm/sec}$
042574
Solution Method: Bouwer-Rice
 $v_0 = 0.5617 \text{ ft}$

Data Set: J:\1352 - Gulfco RI\Groundwater\Slug Tests\Analysis based on Screen Length\NE1MW04_out.aqt
 Title: NE1MW04 Slug Out
 Date: 11/14/07
 Time: 13:26:32

PROJECT INFORMATION

Company: PBW
 Client: Gulfco
 Project: 1352-H2
 Location: Freeport, TX
 Test Date: 11-7-07
 Test Well: NE1MW04

AQUIFER DATA

Saturated Thickness: 12. ft
 Anisotropy Ratio (Kz/Kr): 1.

SLUG TEST WELL DATA

Initial Displacement: 1.95 ft
 Casino Radius: 0.08 ft
 Wellbore Radius: 0.42 ft
 Well Skin Radius: 0.42 ft
 Screen Length: 10. ft
 Total Well Penetration Depth: 12. ft
 Gravel Pack Porosity: 0.2

No. of observations: 35

Observation Data			
Time (min)	Displacement (ft)	Time (min)	Displacement (ft)
0.25	1.18	6.5	0.22
0.5	0.98	7.	0.21
0.75	0.8	8.	0.19
1.	0.69	8.5	0.18
1.25	0.58	9.	0.18
1.5	0.53	9.5	0.17
1.75	0.47	10.	0.16
2.	0.44	11.	0.15
2.25	0.41	12.	0.14
2.5	0.39	13.	0.13
2.75	0.37	14.	0.12
3.	0.35	15.	0.12
3.5	0.32	16.	0.11
4.	0.29	17.	0.11
4.5	0.27	18.	0.1
5.	0.25	19.	0.09
5.5	0.24	20.	0.09
6.	0.22		

SOLUTION

Aquifer Model: Confined
 Solution Method: Bouwer-Rice

VISUAL ESTIMATION RESULTSEstimated Parameters

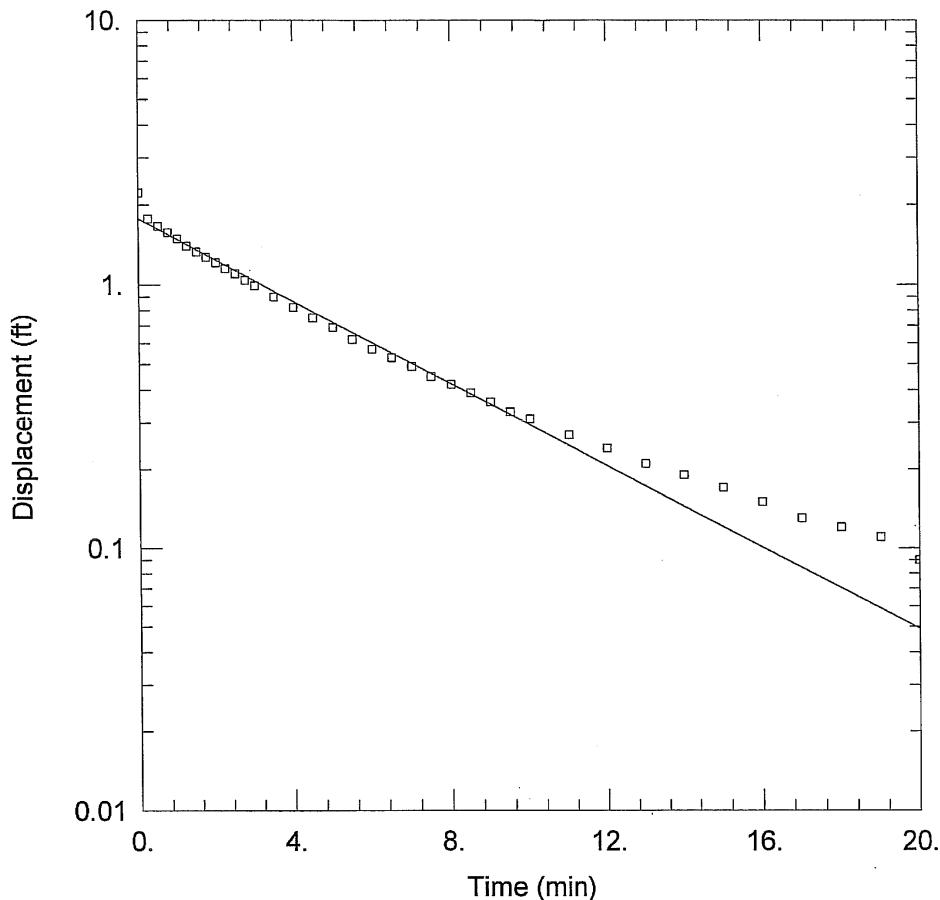
Parameter	Estimate	
K	4.377E-05	cm/sec
y0	0.5617	ft

NE1MW04 Slug Out

Observation	Time	WL	Displacem	Weight
1	0.25	4.8	1.18	1
2	0.5	4.6	0.98	1
3	0.75	4.42	0.8	1
4	1	4.31	0.69	1
5	1.25	4.2	0.58	1
6	1.5	4.15	0.53	1
7	1.75	4.09	0.47	1
8	2	4.06	0.44	1
9	2.25	4.03	0.41	1
10	2.5	4.01	0.39	1
11	2.75	3.99	0.37	1
12	3	3.97	0.35	1
13	3.5	3.94	0.32	1
14	4	3.91	0.29	1
15	4.5	3.89	0.27	1
16	5	3.87	0.25	1
17	5.5	3.86	0.24	1
18	6	3.84	0.22	1
19	6.5	3.84	0.22	1
20	7	3.83	0.21	1
21	8	3.81	0.19	1
22	8.5	3.8	0.18	1
23	9	3.8	0.18	1
24	9.5	3.79	0.17	1
25	10	3.78	0.16	1
26	11	3.77	0.15	1
27	12	3.76	0.14	1
28	13	3.75	0.13	1
29	14	3.74	0.12	1
30	15	3.74	0.12	1
31	16	3.73	0.11	1
32	17	3.73	0.11	1
33	18	3.72	0.1	1
34	19	3.71	0.09	1
35	20	3.71	0.09	1

SJ1MW15 Slug Out

Observatio	Time	WL	Displacem	Weight
1	0.25	5.35	1.77	1
2	0.5	5.24	1.66	1
3	0.75	5.15	1.57	1
4	1	5.07	1.49	1
5	1.25	4.98	1.4	1
6	1.5	4.91	1.33	1
7	1.75	4.85	1.27	1
8	2	4.79	1.21	1
9	2.25	4.73	1.15	1
10	2.5	4.68	1.1	1
11	2.75	4.62	1.04	1
12	3	4.57	0.99	1
13	3.5	4.48	0.9	1
14	4	4.4	0.82	1
15	4.5	4.33	0.75	1
16	5	4.27	0.69	1
17	5.5	4.2	0.62	1
18	6	4.15	0.57	1
19	6.5	4.11	0.53	1
20	7	4.07	0.49	1
21	7.5	4.03	0.45	1
22	8	4	0.42	1
23	8.5	3.97	0.39	1
24	9	3.94	0.36	1
25	9.5	3.91	0.33	1
26	10	3.89	0.31	1
27	11	3.85	0.27	1
28	12	3.82	0.24	1
29	13	3.79	0.21	1
30	14	3.77	0.19	1
31	15	3.75	0.17	1
32	16	3.73	0.15	1
33	17	3.71	0.13	1
34	18	3.7	0.12	1
35	19	3.69	0.11	1
36	20	3.67	0.09	1



SJ1MW15 SLUG OUT

Data Set: J:\...\SJ1MW15_out.aqt
Date: 11/14/07

Time: 13:37:26

PROJECT INFORMATION

Company: PBW
Client: Gulfco
Project: 1352-H2
Test Location: Freeport, TX
Test Well: SJ1MW15
Test Date: 11-7-07

AQUIFER DATA

Saturated Thickness: 12.5 ft Anisotropy Ratio (Kz/Kr): 1.

WELL DATA (SJ1MW15)

Initial Displacement: 2.22 ft Casing Radius: 0.08 ft
Wellbore Radius: 0.42 ft Well Skin Radius: 0.42 ft
Screen Length: 10. ft Total Well Penetration Depth: 12.5 ft
Gravel Pack Porosity: 0.2

SOLUTION

Aquifer Model: Confined Solution Method: Bouwer-Rice
 $K = 7.301E-05 \text{ cm/sec}$ $y_0 = 1.769 \text{ ft}$
042578

Data Set: J:\1352 - Gulfco RI\Groundwater\Slug Tests\Analysis based on Screen Length\SJ1MW15_out.aqt
 Title: SJ1MW15 Slug Out
 Date: 11/14/07
 Time: 13:37:31

PROJECT INFORMATION

Company: PBW
 Client: Gulfco
 Project: 1352-H2
 Location: Freeport, TX
 Test Date: 11-7-07
 Test Well: SJ1MW15

AQUIFER DATA

Saturated Thickness: 12.5 ft
 Anisotropy Ratio (Kz/Kr): 1.

SLUG TEST WELL DATA

Initial Displacement: 2.22 ft
 Casing Radius: 0.08 ft
 Wellbore Radius: 0.42 ft
 Well Skin Radius: 0.42 ft
 Screen Length: 10. ft
 Total Well Penetration Depth: 12.5 ft
 Gravel Pack Porosity: 0.2

No. of observations: 36

Observation Data			
Time (min)	Displacement (ft)	Time (min)	Displacement (ft)
0.25	1.77	6.5	0.53
0.5	1.66	7.	0.49
0.75	1.57	7.5	0.45
1.	1.49	8.	0.42
1.25	1.4	8.5	0.39
1.5	1.33	9.	0.36
1.75	1.27	9.5	0.33
2.	1.21	10.	0.31
2.25	1.15	11.	0.27
2.5	1.1	12.	0.24
2.75	1.04	13.	0.21
3.	0.99	14.	0.19
3.5	0.9	15.	0.17
4.	0.82	16.	0.15
4.5	0.75	17.	0.13
5.	0.69	18.	0.12
5.5	0.62	19.	0.11
6.	0.57	20.	0.09

SOLUTION

Aquifer Model: Confined
 Solution Method: Bouwer-Rice

VISUAL ESTIMATION RESULTS**Estimated Parameters**

Parameter	Estimate	
K	7.301E-05	cm/sec
y0	1.769	ft